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7
8 Attorneys for Defendants Juniper Networks, Inc.,
Scott Kriens, Pradeep Sindhu, Marcel Gani,
Robert M. Calderoni, Kenneth Goldman, William
9 R. Hearst III, Stratton Sclavos, Vinod Khosla,
Kenneth Levy and William R. Stensrud

10 UNITED STATES DISTRICT COURT
11
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION

14 In re JUNIPER NETWORKS, INC.)
SECURITIES LITIGATION)

No. C06-04327-JW

15 This Document Relates To:)
16)

17 ALL ACTIONS.)
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STIPULATION AND [PROPOSED] ORDER
REGARDING FILING OF
CONSOLIDATED BRIEFS REGARDING
MOTIONS TO DISMISS

1 This Stipulation is entered into by and among Lead Plaintiff the New York City Pension
2 Funds, and defendants Juniper Networks, Inc., Scott Kriens, Pradeep Sindhu, Marcel Gani, Robert
3 M. Calderoni, Kenneth Goldman, William R. Hearst III, Stratton Sclavos, Vinod Khosla, Kenneth
4 Levy and William R. Stensrud (the "Juniper Defendants"), by and through their respective attorneys
5 of record.

6 WHEREAS, Defendants Scott Kriens, Pradeep Sindhu and Marcel Gani (the "Officer
7 Defendants") intend to file a motion to dismiss the claims against them, and all of the Juniper
8 Defendants collectively also intend to file a separate motion to dismiss;

9 WHEREAS, it would likely be more convenient for the Court and for opposing counsel if the
10 Officer Defendants and the Juniper Defendants combine their motions to dismiss into a single
11 motion to dismiss with a slightly longer page limit than that provided by the Local Rule 7-4(b); and

12 WHEREAS, the parties intend to meet and confer in good faith in the event that (a) Lead
13 Plaintiff determines to file a single consolidated opposition to the Juniper Defendants' combined
14 motion with a slightly longer page limit, and/or (b) the Juniper Defendants determine to file a single
15 consolidated reply with a slightly longer page limit;

16 NOW, THEREFORE, the parties hereby stipulate, and request the court to order, as follows:

17 1. All the Juniper Defendants shall file and serve a single consolidated motion to
18 dismiss not to exceed thirty-five (35) pages.

19 IT IS SO STIPULATED.

20 DATED: June 6, 2007

WILSON SONSINI GOODRICH & ROSATI, P.C.
NINA F. LOCKER
STEVEN GUGGENHEIM
JONI OSTLER

22 _____
/s/ Joni Ostler

23 Joni Ostler

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26 Attorneys for Defendants Juniper Networks, Inc.,
27 Scott Kriens, Pradeep Sindhu, Marcel Gani, Robert
M. Calderoni, Kenneth Goldman, William R. Hearst
28 III, Stratton Sclavos, Vinod Khosla, Kenneth Levy
and William R. Stensrud

1 I, Joni Ostler, am the ECF user whose ID and password are being used to file this
2 Stipulation and [Proposed] Order Regarding Filing of Amended Complaint and Briefing
3 Schedule. In compliance with General Order 45, X.B., I hereby attest that David C. Harrison
4 has concurred in this filing.

5 DATED June 6, 2007

NEIL L. SELINGER
RICHARD BEMPORAD
DAVID C. HARRISON
LOWEY DANNENBERG BEMPORAD
SELINGER & COHEN, P.C.

7 /s/ David C. Harrison
8 DAVID C. HARRISON

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13 *Lead Counsel for Lead Plaintiff*

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19 *Local Counsel for Lead Plaintiff*

20 * * *

21 **ORDER**

22 PURSUANT TO STIPULATION, IT IS SO ORDERED

23 DATED: June 8 2007

24 
25 THE HONORABLE JAMES WARE
26 UNITED STATES DISTRICT JUDGE